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Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	Case No. 18-CR-00258 EJD
)	
Plaintiff,)	DECLARATION OF KELLY I. VOLKAR IN
)	SUPPORT OF UNITED STATES' OPPOSITION
v.)	TO DEFENDANT'S MOTION TO RECONSIDER
)	ORDER DENYING MOTION TO STRIKE
RAMESH "SUNNY" BALWANI,)	PORTIONS OF SARAH BENNETT'S
)	TESTIMONY
Defendant.)	
)	Date: June 13, 2022
)	Time: 10:00 a.m.
)	Court: Hon. Edward J. Davila

1 I, Kelly I. Volkar, declare:

2 1. I am an Assistant United States Attorney (AUSA) representing the United States of
3 America, the plaintiff in this case.

4 2. Attached hereto as Exhibit 1 is a true and correct copy of a cover email produced in
5 discovery with Bates label THPFM0002435587.

6 3. Attached hereto as Exhibit 2 is a true and correct copy of a document produced in
7 discovery starting with Bates label THPFM0001954626.

8 4. Attached hereto as Exhibit 3 is a true and correct copy of a document produced in
9 discovery starting with Bates label THPFM0000275729.

10 5. Attached hereto as Exhibit 4 is a true and correct copy of a document produced in
11 discovery starting with Bates label TS-1049216.

12 6. Attached hereto as Exhibit 5 is a true and correct copy of a document produced in
13 discovery starting with Bates label THPFM0005218989.

14 7. Attached hereto as Exhibit 6 is a true and correct copy of a document produced in
15 discovery starting with Bates label THPFM0003612503.

16 8. Attached hereto as Exhibit 7 is a true and correct copy of a document produced in
17 discovery starting with Bates label THPFM0004664960.

18 9. Attached hereto as Exhibit 8 is a true and correct copy of a document produced in
19 discovery starting with Bates label THPFM0005487131.

20 10. Attached hereto as Exhibit 9 is a true and correct copy of a document, produced in
21 discovery with Bates label THPFM0003858486, and its attachment, produced in discovery with Bates
22 label THPFM0003858487.

23 11. Attached hereto as Exhibit 10 is a true and correct copy of a document produced in
24 discovery starting with Bates label TS-1048773.

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1 12. I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct and that this declaration is executed at Walnut Creek, California, on
3 June 12, 2022.

4
5 DATED: June 12, 2022

6
7 /s/ Kelly I. Volkar
8 KELLY I. VOLKAR
9 Assistant United States Attorney
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